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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

Prida S. Trapet

MAY 3 0 1989

MEMORANDUM OF CONFERENCE

SUBJECT: Proposed Metabolism Studies for Reregistration of

Phosmet.

FROM: Linda S. Propst, Chemist

Dietary Exposure Branch

Health Effects Division (H7509C)

THRU: Andrew R. Rathman, Section Head

Special Registration Section 1

Dietary Exposure Branch

Health Effects Division (H7509C)

TO: DEB Reading Files

ATTENDED BY: James M. Wagner, ICI Americas Inc.

Andrew A. Davidson, Jr., ICI Americas Inc.

Barbara Briscoe, Special Review (RD) Andrew Rathman, Dietary Exposure Branch Linda S. Propst, Dietary Exposure Branch

The representatives for ICI Americas Inc. requested this meeting to discuss several issues concerning the reregistration of phosmet. They wanted to know if the cherry metabolism studies currently underway would support the pome, stone, and tree nut metabolism requirements? DEB agreed that adequate delineation of the residue in cherries could be translated to pome, stone, and tree nut groups. ICI Americas asked if the pits were to be included in delineating the nature of the residue in cherries? Mr. Rathman said if they were interested in total activity they should analyze the cherry pits otherwise, analysis of the pits were unnecessary.

Since ICI Americas Inc. is considering discontinuing their field, forage and vegetable crops, they asked whether the cherry metabolism study would suffice for the following of their minor crops metabolism study requirements:

Blueberries - We agreed that the cherry metabolism study would support the blueberry use.

Grapes - The registrants were told that grapes were not considered a minor use and a metabolism study of phosmet in grapes would need to be conducted.

Kiwi Fruit - No additional metabolism studies would be needed for the kiwi fruit use.

Tomatoes - Additional metabolism studies would be needed.

Cranberries - DEB gave no definitive answer on whether additional metabolism data would be needed for this crop.

At this point Mr. Rathman asked that the registrant submit these proposals in a letter in order that a written record is made for those crops on which additional metabolism data will or will not be needed.

ICI Americas asked that if they decided to eliminate the row crops from their label if they could then eliminate the residue reduction studies on apples and peaches? They were informed that these studies are dependent on whether or not the ADI has been exceeded. While this is not a DEB problem per se, we suggested that if the registrant was close to their ADI or if it had been exceeded it would then be advisable to conduct those studies. (It appears that the ADI has been exceeded).

The registrants then asked about dose levels for their radiolabelled metabolism studies. We advised that the doses will need to be high enough to allow for identification of the metabolites. The registrants were further advised that in future feeding studies, they will need to take into account that apple pomace can constitute 50% of the beef cattle diet and if residues concentrate in apple pomace, then fairly high dosage levels will be needed.

cc: Reading File, Circulation, Reviewer, Subject File, Registration Standard File, PMSD/ISB RDI: A. R. Rathman, 5/22/89; E. Zager,5/26/89 H7509C:DEB:LSP:lsp:CM2:Rm803C:557-7324:5/26/89

